



State of Illinois

ENVIRONMENTAL PROTECTION AGENCY

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NTC Great Lakes

C-689-M-2

Mary A. Gade, Director

2200 Churchill Road, Springfield, IL 62794-9276

217/524-3300

September 9, 1996

CERTIFIED MAIL
Z 363 621 023

U.S. Navy Great Lakes Naval Training Center
Attn: Mr. Mark Schultz
Building 1, Code 30E
Great Lakes, Illinois 60088-5000

Re: 0971255004 -- Lake County
U.S. Navy Great Lakes Naval Training Center
IL7170024577
Log No. C-689-M-3
Received: June 3, 1996
RCRA Closure

Dear Mr. Schultz:

This letter is in response to the report entitled Partial Closure Certification and Sampling/Inspection Report submitted by Harold C. McGill, Department of the Navy regarding RCRA closure activities at the above-referenced facility. This submittal: (1) requested certification of closure for two hazardous waste container storage areas (referred to as Buildings 145 and 520) and (2) contained additional information regarding closure of three other hazardous waste container storage (SO1) areas (referred to as Buildings 105, 415 and 912). According to the Agency's September 28, 1995 letter, these are the only RCRA hazardous waste management units at the subject facility which have yet to complete closure.

The subject submittal was reviewed as a request to modify the approved final RCRA closure plan for the Great Lakes Naval Training Center and is hereby approved subject to the following conditions and modifications:

1. The contaminant levels in the soil samples collected at Buildings 105, 415 and 912 exceeded the Tier 1 values for volatile organic compounds (VOCs) (mainly tetrachloroethylene) for both residential and industrial/commercial settings. Thus, the next step which the facility must take to complete closure of these units is to properly delineate the extent of soil contamination above Tier 1 values. This should be done by collecting additional samples in and around the three (3) aforementioned buildings.
 - a. For Building 105 soil samples shall be taken at GL95 - 105S-91 at 60" - 66" and soil samples shall be taken at 25' intervals outside and immediately adjacent to the building at 0" - 6" and 18" - 24" except for the northern end of the building.

- b. At Building 415 soil samples shall be taken at 20' intervals along the exterior walls while soil samples shall be taken at 30' intervals along the east and west walls of Building 415 at 0" and 18" - 24".
- c. At Building 912 soil samples shall be taken to the southeast (near the transformer pad) and approximately 10' to the northeast of soil sample GL95-912S-102 at 6" - 12", 30" - 36" and 66" - 72".

A report documenting the results of these additional investigation efforts should be submitted to the Agency by November 15, 1996. This report should be developed in accordance with the attached document entitled RCRA Soil and/or Groundwater Investigation Results Report.

- 2. As indicated above, volatile organic compounds remain in the soil beneath Buildings 105, 415 and 912. If the results of the analyses conducted in Condition 1 adequately determine the extent of soil contamination and detect no levels of contaminants higher than those already detected, then the following applies to Buildings 105, 415, and 912 relative to soil:
 - a. The levels of contaminants detected will not pose a threat to human health or the environment and no further action will be required to close the subject units provided:
 - (1) A relatively impermeable barrier, such as a concrete or asphalt cap, is in place over these soils;
 - (2) The barrier is properly maintained in the future;
 - (3) Restrictions are in place to limit direct human exposure to the soils beneath the cap;
 - (4) A site safety plan to address work exposure to the soil in this area is developed and implemented for any future excavation/construction activate in this area; and
 - (5) Any soil removed from this area during future activities is managed as a hazardous waste in accordance with 35 Ill. Adm. Code, Subtitle G: Waste Disposal.
 - b. A survey plat must be developed which shows the location and dimensions of the subject container storage areas, relative to legal boundaries of the site. The plat must be prepared and certified by a professional land surveyor and be developed with respect to a permanently surveyed benchmark.
 - c. The survey plat identified in Condition 2.b above must contain a note, prominently displayed, which states that:

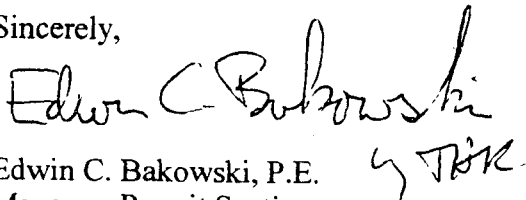
- (1) Three hazardous waste container storage areas (commonly referred to as Buildings 105, 415, and 912) were once present at the facility.
 - (2) Low levels of volatile organic compounds (mainly tetrachloroethylene) remain in the soils beneath the area.
 - (3) The low levels of contaminants in the soils beneath the area pose no threat to human health and the environment provided:
 - (a) A concrete cap or some other type of cover is in place over the container storage areas;
 - (b) The cover is properly maintained;
 - (c) Access to the area is restricted so that humans will not come into direct contact with the soils remaining beneath the area.
 - (d) A site survey plan to address possible worker exposure to the soils in this area must be developed and implemented for any future excavation/construction activities in these areas.
 - (e) Any soil removed from the areas during future activities must be managed as hazardous waste in accordance with 35 Ill. Adm. Code Subtitle G: Waste Disposal.
 - d. The survey plat identified in Conditions 2.b and 2.c above must be:
 - (1) Attached to the deed for the subject property, or on some other instrument which is normally examined during title search, which will in perpetuity notify any potential purchaser of the property of the requirements set forth in the notation identified in Condition 2(c) above;
 - (2) Submitted to the County recorder, any local zoning authority and any other authority over local land use.
 - e. Documentation that the requirements of Conditions 2.a through 2.d above must be included in the certification of closure for the subject units.
3. Below is a list of groundwater objectives for the above-referenced site. In order to meet the clean closure requirements of 35 IAC 725.211, 725.214 and 725.297(a), groundwater in the vicinity of Buildings 105, 415 and 912 must be remediated such that these cleanup objectives are met.

<u>Parameter</u>	<u>Groundwater Objective (mg/l)</u>
cis-1,2 Dichloroethylene	0.07
1,1-Dichloroethane	0.7
1,1-Dichloroethane	0.007
1,2 Dichloroethane	0.005
Tetrachloroethene	0.005
Toluene	1.0
Trans-1,2-Dichloroethene	0.1
1,1,1 Trichloroethane	0.2
Trichloroethene	0.005

4. Pursuant to the information provided, the groundwater beneath buildings 104, 415 and 912 has apparently been impacted. In order to determine the extent of groundwater contamination, the facility should follow the procedures set forth in the IEPA's Draft RCRA Closure Plan Guidance. Specifically, the facility shall follow the procedures set forth in Attachment E of the above-referenced document to aid in their determination of the extent of groundwater impacts. The facility shall also review the attached guidance entitled Procedure for Determination of a Class II Groundwater. It is the facility's responsibility to determine if the groundwater beneath the site meets the criteria for a Class II Groundwater. The Agency assumes the site to be Class I until proven otherwise. A plan for further investigation of the contaminated groundwater must be submitted to the Agency by November 15, 1996.
5. At the time of this letter, an inspection had yet to be performed for the two (2) hazardous waste container storage (SO1) areas referred to as Buildings 145 and 520. Correspondence regarding closure of these two units will be sent at a later date.


Should you have any questions regarding this matter, please contact William T. Sinnott, II or Vickie Broomhead at 217/524-3300.

Sincerely,



Edwin C. Bakowski, P.E.
Manager, Permit Section
Bureau of Land

bcc: Bureau File
Maywood Region
Jim Moore
Bill Sinnott
Vickie Broomhead

ECB: WTS\mls\961532.WPD


Attachment: RCRA Soil and/or Groundwater Investigation Results Report
IEPA Draft Closure Plan Instructions